EX. E

2	A. I have not.	12:51	1	are a director?	12:5
	Q. So sitting here today, you can't tell		2	MS. TESKE: Object to the form.	
3	us anything about Eastern Profit; is that correct?		3	A. Can you please ask it again.	
4	A. That's correct.		4	Q. Is ACA Capital Group Limited the	
5	Q. You don't know what it does?		5	official name of the entity of which you are a	
6	A. I have no idea.		6	director?	
7	Q. Did you realize that we're here in the		7	MS. TESKE: Same objection.	
8	case of Eastern Profit versus Strategic Vision?		8	You can answer,	
9	MS. TESKE: Object to the form,		9	A. I am not sure.	
10	You can answer.		10		
11	A. Yes, I did.		11		
12	Q. So other than hearing that it's in the		12	notice of subpoena.  A. Mm-hmm.	
13	title of the case, you've never heard of Eastern		13		
14	Profit?		14	Q. If you turn to page 3, you'll see the	
15	A. I have not.	12:51	15	subpoena itself. Do you see that?	76.5
16			16	A. I do.	12:5
17	Q. Have you ever heard of Strategic Vision?		17	MS. TESKE: Object to the form.	
18	A. I have not.			You can answer.	
19			18	Q. And do you see about a quarter of the	
20	Q. And you understand it's in the title of		19	way down it says "To"?	
21	the case that we're here under, correct?		20	A. Yes.	
22	A. That's correct.		21	Q. Okay. And what does it say on that	
23	Q. So you've never spoken to Yvette Wang		22	line, could you read that, please?	
	about Strategic Vision?		23	A. "ACA Capital Group Limited to be served	
24	A. No, I have not.		24	to its director, Karin Maistrello 17 Gifford	
25	Q. You've never spoken to Yvette Wang		25	Apartment 5F, Jersey City, New Jersey, 07304."	
	Pa	ge 54		Pa	ige 56
1	about Eastern Profit?	12:52	1	Q. Is that your address?	12:55
2	A. No, I have not.		2	A. It is,	
3	(Whereupon, Maistrello Exhibit 3,		3	Q. And were you served with this subpoena	
4	suppoend issued to ACA Capital Group Limited.		4	• • • • • • • • • • • • • • • • • • • •	
4 5	subpoena issued to ACA Capital Group Limited, is marked for identification, as of this		4 5	at that address?	
4 5 6	is marked for identification, as of this			at that address?  MS. TESKE: Object to the form.	
4 5 6 7	is marked for identification, as of this date.)		5 6	at that address?  MS. TESKE: Object to the form.  You can answer.	
_	is marked for identification, as of this date.) (Whereupon, Maistrello Exhibit 4,		5 6 7	at that address?  MS. TESKE: Object to the form.  You can answer.  A. Yes.	
7	is marked for identification, as of this date.) (Whereupon, Maistrello Exhibit 4, subpoena issued to Karin Maistrello, is marked		5 6 7 8	at that address?  MS. TESKE: Object to the form. You can answer.  A. Yes. Q. What did you do after you were served	
7	is marked for identification, as of this date.) (Whereupon, Maistrello Exhibit 4, subpoena issued to Karin Maistrello, is marked for identification, as of this date.)		5 6 7 8 9	at that address?  MS. TESKE: Object to the form. You can answer.  A. Yes. Q. What did you do after you were served with this subpoena?	
7 8 9	is marked for identification, as of this date.)  (Whereupon, Maistrello Exhibit 4, subpoena issued to Karin Maistrello, is marked for identification, as of this date.)  Q. I'm going to hand you what we're		5 6 7 8 9	at that address?  MS. TESKE: Object to the form. You can answer.  A. Yes. Q. What did you do after you were served with this subpoena?  MS. TESKE: Object if the form.	
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7 8 9 10 11	is marked for identification, as of this date.)  (Whereupon, Maistrello Exhibit 4, subpoena issued to Karin Maistrello, is marked for identification, as of this date.)  Q. I'm going to hand you what we're marking as Exhibits 3 and 4.  Please take a look at Exhibit 3.		5 6 7 8 9 10 11 12	at that address?  MS. TESKE: Object to the form. You can answer.  A. Yes. Q. What did you do after you were served with this subpoena?  MS. TESKE: Object if the form. You can answer it.  A. I gave it to our lawyer.	
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7 8 9 10 11 12 13	is marked for identification, as of this date.)  (Whereupon, Maistrello Exhibit 4, subpoena issued to Karin Maistrello, is marked for identification, as of this date.)  Q. I'm going to hand you what we're marking as Exhibits 3 and 4.  Please take a look at Exhibit 3.  A. Which one is that?  MR. GRENDI: Which one is that,	19.54	5 6 7 8 9 10 11 12 13 14	at that address?  MS. TESKE: Object to the form. You can answer.  A. Yes. Q. What did you do after you were served with this subpoena?  MS. TESKE: Object if the form. You can answer it.  A. I gave it to our lawyer. Q. And was that Ms. Teske sitting here next to you?	
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7 8 9 10 11 12 13 14 15	is marked for identification, as of this date.)  (Whereupon, Maistrello Exhibit 4, subpoena issued to Karin Maistrello, is marked for identification, as of this date.)  Q. I'm going to hand you what we're marking as Exhibits 3 and 4.  Please take a look at Exhibit 3.  A. Which one is that?  MR. GRENDI: Which one is that, they look the same.  MR. GREIM: They're not. You'll	12:54	5 6 7 8 9 10 11 12 13 14 15 16	at that address?  MS. TESKE: Object to the form. You can answer.  A. Yes. Q. What did you do after you were served with this subpoena?  MS. TESKE: Object if the form. You can answer it.  A. I gave it to our lawyer. Q. And was that Ms. Teske sitting here next to you?  A. It was not. Q. Who was that?	12:56
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7 8 9 9 110 111 112 113 114 115 116 117 118 119 119 119 119 119 119 119 119 119	is marked for identification, as of this date.)  (Whereupon, Maistrello Exhibit 4, subpoena issued to Karin Maistrello, is marked for identification, as of this date.)  Q. I'm going to hand you what we're marking as Exhibits 3 and 4.  Please take a look at Exhibit 3.  A. Which one is that?  MR. GRENDI: Which one is that, they look the same.  MR. GREIM: They're not. You'll see it's a bit different.  MS. TESKE: Which one is 3?  MR. GREIM: Exhibit 3 is the ACA.  MS. TESKE: Thank you.	12:54	5 6 7 8 9 10 11 12 13 14 25 16 17 18 19 20	at that address?  MS. TESKE: Object to the form. You can answer.  A. Yes. Q. What did you do after you were served with this subpoena?  MS. TESKE: Object if the form. You can answer it.  A. I gave it to our lawyer. Q. And was that Ms. Teske sitting here next to you?  A. It was not. Q. Who was that? A. Daniel Podhaskie. Q. When you say "our lawyer," do you mean Golden Spring's lawyer?  A. Golden Spring's lawyer.	12:56
7 7 8 9 9 9 110 111 112 113 114 115 116 117 118 119 119 119 119 119 119 119 119 119	is marked for identification, as of this date.)  (Whereupon, Maistrello Exhibit 4, subpoena issued to Karin Maistrello, is marked for identification, as of this date.)  Q. I'm going to hand you what we're marking as Exhibits 3 and 4.  Please take a look at Exhibit 3.  A. Which one is that?  MR. GRENDI: Which one is that, they look the same.  MR. GREIM: They're not. You'll see it's a bit different.  MS. TESKE: Which one is 3?  MR. GREIM: Exhibit 3 is the ACA.  MS. TESKE: Thank you.  Q. So do you see that Exhibit 3 is a	12:54	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	at that address?  MS. TESKE: Object to the form. You can answer.  A. Yes. Q. What did you do after you were served with this subpoena?  MS. TESKE: Object if the form. You can answer it.  A. I gave it to our lawyer. Q. And was that Ms. Teske sitting here next to you?  A. It was not. Q. Who was that? A. Daniel Podhaskie. Q. When you say "our lawyer," do you mean Golden Spring's lawyer?  A. Golden Spring's lawyer. Q. Now, don't I'm not going to ask you for the content of your discussion. My only question	12:56
7 7 8 9 9 110 111 112 113 114 115 116 117 118 119 119 119 119 119 119 119 119 119	is marked for identification, as of this date.)  (Whereupon, Maistrello Exhibit 4, subpoena issued to Karin Maistrello, is marked for identification, as of this date.)  Q. I'm going to hand you what we're marking as Exhibits 3 and 4.  Please take a look at Exhibit 3.  A. Which one is that?  MR. GRENDI: Which one is that, they look the same.  MR. GREIM: They're not. You'll see it's a bit different.  MS. TESKE: Which one is 3?  MR. GREIM: Exhibit 3 is the ACA.  MS. TESKE: Thank you.  Q. So do you see that Exhibit 3 is a subpoena to ACA Capital Group Limited?	12:54	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	at that address?  MS. TESKE: Object to the form. You can answer.  A. Yes. Q. What did you do after you were served with this subpoena?  MS. TESKE: Object if the form. You can answer it.  A. I gave it to our lawyer. Q. And was that Ms. Teske sitting here next to you?  A. It was not. Q. Who was that? A. Daniel Podhaskie. Q. When you say "our lawyer," do you mean Golden Spring's lawyer?  A. Golden Spring's lawyer. Q. Now, don't I'm not going to ask you	12:56
7 7 8 9 9 9 110 111 112 113 114 115 116 117 118 119 119 119 119 119 119 119 119 119	is marked for identification, as of this date.)  (Whereupon, Maistrello Exhibit 4, subpoena issued to Karin Maistrello, is marked for identification, as of this date.)  Q. I'm going to hand you what we're marking as Exhibits 3 and 4.  Please take a look at Exhibit 3.  A. Which one is that?  MR. GRENDI: Which one is that, they look the same.  MR. GREIM: They're not. You'll see it's a bit different.  MS. TESKE: Which one is 3?  MR. GREIM: Exhibit 3 is the ACA.  MS. TESKE: Thank you.  Q. So do you see that Exhibit 3 is a subpoena to ACA Capital Group Limited?  A. Mm-hmm, yes.	12:54	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	at that address?  MS. TESKE: Object to the form. You can answer.  A. Yes. Q. What did you do after you were served with this subpoena?  MS. TESKE: Object if the form. You can answer it. A. I gave it to our lawyer. Q. And was that Ms. Teske sitting here next to you?  A. It was not. Q. Who was that? A. Daniel Podhaskie. Q. When you say "our lawyer," do you mean Golden Spring's lawyer?  A. Golden Spring's lawyer. Q. Now, don't I'm not going to ask you for the content of your discussion. My only question is, did you ask Mr. Podhaskie for legal advice?	12:56

1	whoa.	12:56	1	You can answer.	12:5
2	MR. GRENDI: Object. Yes or no, yeah.		2	A. Yes. I believe so.	
3	Q. Yes or no. It's a yes or no answer.		3	Q. So do you recall receiving two	
4	MS. TESKE: If you thought you		4	subpoenas, one for you, Karin Maistrello and the	
5	were seeking legal advice, say yes. If		5	other for ACA to be served on you?	
6	not, you can say no.		6	MS. TESKE: Object to the form.	
7	A. Then no.		7	You can answer.	
8	Q. All right. Then what did you discuss		8	A. Yes.	
9	with him?		9		
10	A. I asked him what should I do with		10	Q. And when you said that you gave them to	
11	these.		11	Mr. Podhaskie. Did you give him both subpoenas?	
12	Q. And what did he say?		12	A. Yes.	
13	-		13	Q. And you didn't keep a copy of either	
14	MS. TESKE: No, no, no, no, no.			subpoena, correct?	
15	MR. GRENDI: Yeah.	12:57	14	A. Correct.	
16	MS. TESKE: That sounds like	12:57	15	Q. Did you you'll see that on the back	12:5
17	MR. GRENDI: Misunderstanding,		16	of the one that's addressed to you, this is	
18	MS. TESKE: No. That's sounds		17	Exhibit 4, if you look, there's an Exhibit A. Do you	
	like a misunderstanding, so I'm going to		18	see it lists about eight different document items?	
19	direct the witness not to answer.		19	A. Yes,	
20 21	MR. GREIM: Okay,		20	Q. Did you take any steps to search for	
21	Q. What did you do with these after you		21	these documents?	
22	showed them to Mr. Podhaskie?		22	MS. TESKE: Object to the form.	
23	A. Nothing.		23	You can answer,	
24	Q. I'm sorry. Did you give them to him or		24	A. No.	
25	did you keep them?		25	Q. Let me ask you this. When was the	
	Pa	ge 58		Pa	ge 6
1	<ul> <li>A. I gave them to him.</li> </ul>	12:57	1	first time that you saw Exhibits 3 and 4.	01:0
2	Q. Did you keep a copy for yourself?		2	MS. TESKE: Object to the form.	
3	A. I did not.	i	3	A. I don't know. To be honest, when I	
4	Q. And just to be clear, let's also take a		4	received this, I didn't read them.	
5	look at Exhibit 4. Do you recognize Exhibit 4?		5	Q. Did you read them before you gave them	
6	A. I do not.		6	to Mr. Podhaskie?	
7	Q. Okay. You'll see that under where it		7	A. I did not,	
8	says, "Please take notice," do you see that it says		8	Q. Had you seen Exhibits 3 and 4 before	
9	that "The defendant/counterclaim plaintiff shall		9	the time you were served with process at your house?	
.0	cause the attached subpoena directed to nonparty		10	MS. TESKE: Object to the form.	
L 1	Karin Maistrello to be served after service of this		11	You can answer.	
12	notice." Do you see that?		12	A. No.	
. 3	A. Yes, I do.		13	Q. Why did you choose to resign?	
. 4	Q. And then if you turn two pages, you see		14	•	
. 5	a subpoena?	12:58	15	Well, let me strike that.	01:0
16	MS. TESKE: Object to the form.		16	, , , , , , , , , , , , , , , , , , ,	0::0
.7	A. Yes.		17	A. I heard from Daniel that something was	
.8			18	going on with ACA, something I	
.9	-	İ		MS. TESKE: Whoa, whoa, whoa,	
20	A. I see it.		19	whoa, whoa, whoa, whoa.	
	Q. Could you read who that's to?		20	MR. GRENDI: Yeah.	
21	A. "Karin Maistrello, 17 Gifford Avenue,		21	MS. TESKE: Conversations between	
2	Apartment 5F, Jersey City, New Jersey, 07304."		22	you and Daniel are privileged and you are	
!3	Q. Is this the subpoena that did you		23	directed not to answer with respect to	
4	received?		24	those conversations.	
	MC TECKE, Objection to fo		25	MD_CDETM: I would any thin if	
15	MS. TESKE: Objection to form.			MR. GREIM: I would say this, if	

you about things that Podhaskie told you, not about advice he gave you, okay? There's a difference. What did Mr. Podhaskie tell you was going on with ACA?  MS. TESKE: Object to the form of you can be really the question. Direct the witness not to answer.  In person.  Page 62  MS. TESKE: You can answer.  Page 62  MS. TESKE: You can answer.  Page 62  MS. TESKE: You can answer.  At our office.  MR. GREIM: We'll see. We'll find a way.  Q. Let's be very careful here, okay. I don't want you to waive any privilege.  When can was the discussion with Mr. Podhaskie that you was the discussion with Mr. Podhaskie was it over the phone or in person?  At Just the two of us.  Q. What time of day was it?  A. Just the two of us.  Q. Was it on July 26th?  A. I don't remember.  MR. GREIM: Was it on July 25th?  MR. TESKE: Object to the form of the question and direct the witness not to answer.  16  17  Q. Just go slowly, give your counsel a chance to object if she wants to, okay?  18  Chance to object if she wants to, okay?  19  Q. Jud Mr. Podhaskie, — when you spoke with Mr. Podhaskie, — when you spoke with Mr. Podhaskie, was it over the phone or in person?  A Hon't remember.  18  Chance to object if she wants to, okay?  19  MS. TESKE: You can answer.  11  A. At our office.  91:0  MS. TESKE: You can answer.  12  Q. What time of day was it?  A. A Just time of day was it?  A. Just the two of us.  Q. Who else was present?  A. She was not.  Without getting into any legal advice, did Mr. Podhaskie that you what he had spoken with William Je?  MS. TESKE: Object to the form of the question and direct the witness not to answer.	telling her that a subpoena is coming,  that is entirely another thing.  Q. So I'm going to ask you  MS. TESKE: No. Well okay.  MR. GREIM: I'll make my record  MS. TESKE: That's fine.  MR. GREIM: and you can listen  MS. TESKE: Don't answer the  question.  Q. So we'll take this in steps, okay?  MS. TESKE: Don't answer the  question.  Q. Did Mr. Podhaskie I'm going to ask  you about things that Podhaskie told you, not about  advice he gave you, okay? There's a difference.  What did Mr. Podhaskie tell you was  going on with ACA?  MS. TESKE: Object to the form of	relating to ACA?  MS. TESKE: Object to the form. You can answer.  A. No. Q. What did Mr. Podhaskie tell you was going on with ACA?  MS. TESKE: Object to the form. Direct you not to answer.  I need to know more about the context in which this communication happened before she can answer that question.  MR. GREIM: Okay. We'll keep going. We'll see, we'll pick around the edges here.
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MR. GREIM: 1'll make my record — MR. GREIM: - and you can listen and you can Q. So well take this in steps, okay? MS. TESKE: Object to most to answer the question. Q. Did Mr. Podhaskie — I'm going to ask you about things that Podhaskie told you, not about advice he gave you, okay? There's a difference. What did Mr. Podhaskie tell you was going on with ACA? MS. TESKE: Object to the form of the question. Direct the witness not to answer. I need — if you can be really specific in what you're asking.  MR. GREIM: 1'll make my record — MR. GREIM: Okay.  Page 62  MS. TESKE: Object to the form of the question. Direct the witness not to answer.  I need — if you can be really specific in what you're asking.  MR. GREIM: Okay.  Page 62  MS. TESKE: Object to the form of the question. Direct the witness not to and the passe of the form of the question and direct the witness not to answer.  Page 62  MS. TESKE: And she can tell me and I can decide whether or not that's an attorney-client privileged communication.  MR. GREIM: Well see. Well find a way. Q. Let's be very careful here, okay. I don't want you to waive any privilege. When can was the discussion with Mr. Podhaskie that you were starting to tell us about? A. I don't remember. Q. Was it on July 25th? A. I don't remember. Q. Was it on July 25th? A. I don't remember. Q. Was it on July 25th? A. I don't remember. Q. Was it on July 25th? A. I don't remember. Q. Was it on July 25th? A. I don't remember. Q. Was it on July 25th? A. I don't remember. Q. Was it on July 25th? A. I don't remember. Q. Was it on July 25th? A. I don't remember. Q. Was it on July 25th? A. I don't remember. Q. Was it on July 25th? A. I don't remember. Q. Was it on July 25th? A. I don't remember. Q. Was it on July 25th? A. I don't re	MS. TESKE: That's fine.  MR. GREIM: and you can listen  MR. GREIM: and you can listen  MS. TESKE: Don't answer the question.  Q. Did Mr. Podhaskie I'm going to ask  you about things that Podhaskie told you, not about advice he gave you, okay? There's a difference.  What did Mr. Podhaskie tell you was  young on with ACA?  MS. TESKE: Object to the form of	MS. TESKE: Object to the form. Direct you not to answer.  I need to know more about the context in which this communication happened before she can answer that question.  MR. GREIM: Okay. We'll keep going. We'll see, we'll pick around the edges here.
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18 What did Mr. Podhaskie tell you was going on with ACA? 29 MS. TESKE: Object to the form of the question. Direct the witness not to answer. 21 In ead — if you can be really specific in what you're asking. 22 MR. GREIM: Okay.  23 In ead — if you can be really specific in what you're asking. 24 Q. Where did the conversation take place? 25 MR. GREIM: Okay.  26 Page 62  27 MS. TESKE: You can answer. 28 MR. GREIM: Okay.  28 MS. TESKE: You can answer. 29 MS. TESKE: You can answer. 29 MS. TESKE: You can answer. 20 Where did the conversation take place? 21 MS. TESKE: You can answer. 22 MS. TESKE: You can answer. 23 A In person. 24 Q. Where did the conversation take place? 25 MS. TESKE: You can answer. 26 MR. GREIM: We'll see. We'll find a way. 27 A I don't remember. 28 When can was the discussion with Mr. Podhaskie that you were starting to tell us about? 29 A I don't remember. 20 Was it on July 25th? 31 A I don't remember. 32 Q. Was it on July 25th? 33 A I don't remember. 34 Q. Was it on July 25th? 35 A Just the two of us. 36 Q. Without getting into any legal advice, did Mr. Podhaskie that you were starting to tell us about? 39 MS. TESKE: Object to the form. 30 MS. TESKE: Object to the form. 31 A I don't remember. 32 Q. Was it on July 25th? 33 A I don't remember. 34 Q. Was it on July 25th? 35 A Just the two of us. 36 Q. Without getting into any legal advice, did Mr. Podhaskie that you were sake with William Je? 30 MS. TESKE: Object to the form. 31 A I don't remember. 32 MS. TESKE: Object to the form. 33 A In person. 34 A to our office. 34 A At our office. 35 A Just the two of us. 36 Q. Was vette Wang present? 37 A She was not. 38 Q. Without getting into any legal advice, did Mr. Podhaskie that be had spoken with William Je? 39 MS. TESKE: Object to the form of the question and direct the witness not to answer. 40 Q. Did Mr. Podhaskie — okay. 41 Let me ask you this. At the end of the question and direct the witness not to answer. 41 MS. TESKE: Object to the form of the question and direct the witness not to answer. 42	18 What did Mr. Podhaskie tell you was 18 19 going on with ACA? 19 20 MS. TESKE: Object to the form of 20	
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A. I do not remember.  Ol:02  Does Mr. Podhaskie did you understand Mr. Podhaskie to be counsel to ACA?  MS. TESKE: Object to the form. You can answer.  A. No.  Ol:02  MS. TESKE: Object to the form. You dan answer.  A. No.  Ol:04  MS. TESKE: Object to the form. You can answer.  A. No.  Ol:05  Let me ask you this. At the end of the conversation, did you tell Mr. Podhaskie that you were going to resign as an ACA director?  MS. TESKE: Object to the form of the question and direct the witness not to answer.  MR. GREIM: The problem is that's a yes or no answer.  MS. TESKE: Object to the form. You can answer.  MS. TESKE: But it's a yes or no answer about what she told her company's lawyer in a conversation where it was	7. Tuell Chemich Control Chemich Control Chemich Chemi	to answer.
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18 MS. TESKE: Object to the form. 19 You can answer. 20 A. No. 21 Q. Did you ever ask Mr. Podhaskie for 22 legal advice relating to ACA? 23 MS. TESKE: Object to the form. 24 You can answer. 25 A. No. 26 MS. TESKE: Object to the form. 27 MS. TESKE: Object to the form. 28 MS. TESKE: But it's a yes or no answer. 29 A. No. 20 MS. TESKE: But it's a yes or no answer about what she told her company's lawyer in a conversation where it was	Q. Boos in robinstic and you	the conversation, did you tell Mr. Podhaskie that you
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You can answer.  24	regardovice relating to AcA:	•
A. No. 25 lawyer in a conversation where it was	FIS. TESKE. Object to the form,	PLA. II ANI DELLE NA VES DE DO
	Tod carranswer,	• • • • • • • • • • • • • • • • • • • •
		answer about what she told her company's

2	just the two of them about an issue in	01:05	1	about a legal document?	01:0
	which she may very well have been seeking		2	MS. TESKE: She's already	
3	legal advice whether or not, you know,		3	testified that she did. She already	
4	she understands the scope of that or not,		4	testified that she brought these	
5	and she's a Golden Spring employee who		5	documents to him. I'm not going to allow	
6	went to the only attorney she knows,		6	the witness to divulge infor	
7	Golden Spring's attorney, to talk about a		7	MR. GREIM: That was the difficult	
8	legal document and you want to inquire		8	conversation. That's the question.	
9	about those conversations. And I just		9	That's the key. That's when she handed	
10	can't give you a lot of leeway there.		10	him the documents. This conversation	
11	MR. GREIM: But the problem is,		11	happened earlier, that's what I'm asking	
12	though, that it's incumbent upon the		12	about.	
13	attorney not every lawyer-client		13	Q. And so my	
14	discussion is protected by the privilege,		14	MS. TESKE: We don't	
15	and if she's coming to him as the ACA	01:06	15	Q. My question is, in the conversation	01:0
16	director and he's not counsel for ACA		16	where you said you heard from Daniel something was	
17	MS. TESKE: It doesn't matter.		17	going on with ACA let me ask you. That was not	
18	MR. GREIM: it's incumbent upon		18	the conversation where you gave him these documents,	,
19	him to say I'm counsel for Golden Spring.		19	was it?	
20	But we don't need to do this on the		20	A. It was not.	
21	record. I understand your objection.		21	Q. So in the conversation where Daniel	
22	Q. Let me ask you this. Did Mr. Podhaskie		22	said something was going on with ACA, did you come	
23	initiate the conversation or did you?		23	did you start that conversation with Podhaskie and	
24	MS. TESKE: Object to the form.		24	come to ask him a question or did Podhaskie come to	
25	You can answer.		25	you?	
	Pa	ge 66		Pa	ige 6
1	A. I'm not clear about what conversation	01:06	1	MS. TESKE: Okay, Object, Direct	01:0
2	we're talking about.		1 .		
	0 0 0 1 1 1 1 1		2	the witness not to answer.	
3	<ul> <li>Q. Okay. You began to tell us a few</li> </ul>		3	the witness not to answer. The only way I am going to get	
4	Q. Okay. You began to tell us a few minutes ago that you heard from Daniel something was		ĺ	The only way I am going to get	
4 5			3	The only way I am going to get comfortable with the witness answering	
4 5 6	minutes ago that you heard from Daniel something was		3 4	The only way I am going to get	
4 5 6 7	minutes ago that you heard from Daniel something was going on with ACA. That's the conversation I'm		<b>3</b> 4 5	The only way I am going to get comfortable with the witness answering these questions is if I know more about	
4 5 6 7 8	minutes ago that you heard from Daniel something was going on with ACA. That's the conversation I'm talking about.		3 4 5 6	The only way I am going to get comfortable with the witness answering these questions is if I know more about what those conversations entailed, and I	
4 5 6 7 8 9	minutes ago that you heard from Daniel something was going on with ACA. That's the conversation I'm talking about. So my question to you is, did you		3 4 5 6 7	The only way I am going to get comfortable with the witness answering these questions is if I know more about what those conversations entailed, and I don't and that conversation can't	
4 5 6 7 8 9	minutes ago that you heard from Daniel something was going on with ACA. That's the conversation I'm talking about.  So my question to you is, did you initiate that conversation or did Mr. Podhaskie?  MS. TESKE: Okay. Object and direct the witness not to answer, and I		3 4 5 6 7 8	The only way I am going to get comfortable with the witness answering these questions is if I know more about what those conversations entailed, and I don't and that conversation can't happen on the record.	
4 5 6 7 8 9 10	minutes ago that you heard from Daniel something was going on with ACA. That's the conversation I'm talking about.  So my question to you is, did you initiate that conversation or did Mr. Podhaskie?  MS. TESKE: Okay. Object and		3 4 5 6 7 8 9	The only way I am going to get comfortable with the witness answering these questions is if I know more about what those conversations entailed, and I don't and that conversation can't happen on the record.  MR. GREIM: Okay.	
4 5 6 7 8 9 10 11	minutes ago that you heard from Daniel something was going on with ACA. That's the conversation I'm talking about.  So my question to you is, did you initiate that conversation or did Mr. Podhaskie?  MS. TESKE: Okay. Object and direct the witness not to answer, and I		3 4 5 6 7 8 9	The only way I am going to get comfortable with the witness answering these questions is if I know more about what those conversations entailed, and I don't and that conversation can't happen on the record.  MR. GREIM: Okay. MS. TESKE: I need to step out	
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2	MS. TESKE: And I'm going to	01:09	1	Q. What are the things that you don't want	01:1
3	caution you not to reveal any		2	to be involved in?	
J	communications that you had with		3	MS. TESKE: Object to the form.	
4	Mr. Podhaskie.		4	You can answer.	
5	A. Can you repeat your question, please.		5	A. I don't know,	
6	Q. Why did you decide to resign as an ACA		6	Q. But whatever they were, they were	
7 (	director on July 26th?		7	serious enough for you to resign from ACA?	
8	A. I did not want to get involved in		8	MS. TESKE: Object to the form.	
9 <b>t</b>	things that I'm not involved with.		9	You can answer.	
10	Q. What are those things?		10	MR. GRENDI: Object to the form.	
11	A. To be honest, I don't know.		11	A. I don't know.	
12	Q. Is it are you referring to this		12	Q. You just testified a second ago that	
13 (	case?		13	you trusted Mr. Je because you shared a mission of	
14	A. I don't know anything about this case.		14	making China a better place, right?	
15 7	To be honest, I don't even know why I'm here. The	01:10	15		01:1
	reason why I worked for this company, why I trust		16		
	William is because we share a mission. That's what		17	Q. And is that the mission you thought ACA had?	
	makes me trust him and that's probably why he trusts		18		
	me.		19	A. No. I trust him as a person as I know that he shares the same idea about the Communist	
20	Anything else, what he does, who he is,		20		
21 <b>F</b>	his family, I don't know. I don't care. We're		21	Party and how bad they are. I am not talking about	
	trying to work to make China a better place and		22	ACA or any other thing. I was talking specifically	
	that's all that matters.		23	about him as a person.	
24	Q. Why did you think that resigning from		24	Q. So what is the thing you were trying to	
25 <b>A</b>	ACA as a director would keep you from getting		25	keep from getting involved in by resigning as a director?	
	Pa	ge 70		Page	e 72
_	, , , , , , , , , , , , , , , , , , , ,	01:11	1	MS. TESKE: Object to the form.	1:13
3	in?		2	You can answer,	
4	MS. TESKE: Object to the form.		3	A. I don't know. I don't know	
5	You can answer,		4	specifically what's going on here with these with	
6	A. Can you repeat your question, please.		5	any company. I just feel that I don't want to be	
7	MR. GREIM: I'll have the court		6	involved in something that does not belong to me.	
	reporter do that.		7	Q. What did you learn that made you decide	
8 9	(Whereupon, the record is read.)		8	that you did not want to be involved in ACA as of	
	A. I'm not sure I understand the question.		9	July 26th?	
10 11 n	Q. You told me a few minutes ago that you		10	MS. TESKE: Object to the form.	
	resigned from ACA because you did not want to get		11	You can answer,	
•	nvolved in things that you don't want to be involved		12	A. Really nothing.	
<sup>13</sup> iı 14	n. Do you remember that testimony?		13	Q. Was it something Mr. Podhaskie told	
14 15	MS. TESKE: Object to the form.		14	you?	
	Tod Cont Griotters	01:11	15	The state of the s	1:14
I6 17	A. Yes,		16	and object to the form.	
	Q. And so, my question is, why did you		17	You can answer without giving away	
	hink that resigning as a director of ACA would		18	any substance of communications.	
	accomplish that goal?		19	A. Yes.	
20	MS. TESKE: Object to the form.		20	Q. So it's something Mr. Podhaskie told	
21	You can answer.		21	you but you can't tell us what that thing is; is that	
	<ul> <li>A. Let's put it this way. You are part of</li> </ul>		22	your testimony today?	
	s company or you work in a store. There are things		23	MS, TESKE: Because I'm directing	
<sup>23</sup> a					
<sup>24</sup> ir	n the store that you don't want to get involved with. You resign. You're not part of it any more.		24 25	her not to.	